



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUL 31 2012

REPLY TO THE ATTENTION OF:

Chris Hare
Acting Upper Peninsula District Supervisor
Michigan Department of Environmental Quality
Upper Peninsula District Office
420 5th Street
Gwinn, Michigan 49841

Dear Mr. Hare:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), Permit Number MI-ROP-B4261-2012, for Wisconsin Electric Power Company Presque Isle Power Plant (Presque Isle) located in Marquette, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Condition III of EUBOILER5 (Emission Unit) and EUBOILER6, located on pages 23 and 28 of the draft ROP respectively, require Presque Isle to operate the electrostatic precipitator and low Nitrogen Oxides (NOx) burners or combustion control technology when boiler 5 and boiler 6 are in operation. However, boilers 5 and 6 also operate a baghouse to help control Particulate Matter (PM) but the draft ROP does not have a federally enforceable condition requiring operation of the baghouse. Please explain why the draft ROP does not contain an enforceable condition requiring Presque Isle to also operate the baghouse when boiler 5 or boiler 6 is in operation and add a condition to the ROP to require the operation of the baghouses if necessary.
- 2.) Condition V.1 of EUBOILER5, EUBOILER6, EUBOILER7, EUBOILER8, and EUBOILER9, located on pages 23, 29, 34, 40, and 46 of the draft ROP respectively, requires Presque Isle to conduct PM testing to determine compliance with the PM emission limit established in condition I for each EU. Currently, the draft ROP requires PM testing within 3 years of the effective date of the ROP. However, this condition does not define a specific interval between tests. The PM testing interval, as currently written in the draft ROP, potentially allows for anywhere from 2 to 8 years or more to elapse between subsequent PM tests. Please explain how testing conducted within 3 years of the effective date of the ROP ensures compliance with the emission limit or modify the PM testing interval to require periodic testing on a specific interval.
- 3.) Condition VI.6 of EUBOILER 5 and EUBOILER 6, located on pages 24 and 29 of the draft ROP respectively, defines an opacity excursion as an opacity reading exceeding 15% based on a 3-hour block average. Condition VI.6 of EUBOILER7, EUBOILER8,

and EUBOILER9, located on pages 35, 41, and 47 of the draft ROP respectively, defines an opacity excursion as an opacity reading exceeding 18% based on a 3-hour block average. The description provided for each boiler indicates that the boilers are largely similar. Further, the data presented and justification given for choosing these opacity indicators in the compliance assurance monitoring (CAM) plan are similar. Please explain why 15% is an appropriate opacity indicator for boilers 5 and 6 while 18% is an appropriate opacity indicator for boilers 7, 8, and 9. Include this justification in the permit record and update the CAM plan if necessary.

- 4.) Condition V.1 and VI.1 of EUASHHANDLING, located on page 51 and 52 of the draft ROP, requires Presque Isle to use trained plant staff to conduct and record visible emissions (VE) observations of each ash handling system baghouse and other emission points at least once per week if the source is in operation. The permit condition does not include a specific test method that is to be used to verify VE, does not define what trained plant staff means as it relates to taking observations, and does not specify follow-up actions to be taken when VE are observed by trained plant staff. Please explain and provide in the permit record how condition V.I currently ensures compliance with the PM emission limit or specify monitoring and reporting requirements in the ROP to ensure compliance with the PM emission limit.
- 5.) Condition VI.1 of EUMATERIALHANDLING, beginning on page 53 and continuing onto page 54 of the draft ROP, requires VE observations to be conducted by either a EPA method 9 certified reader or by a non-certified reader. The permit condition further states that EPA method 9 shall be used at the request of Michigan Department of Environmental Quality but does not specify when such a test would be required. Please explain and include in the permit record how visual observations performed by non-certified readers ensure compliance with the PM emission limit, when certified or non-certified observers are used for observations, when EPA method 9 observations are used, and what responses and corrective actions are required when VE are observed. Otherwise, please include monitoring, recordkeeping, and reporting in the ROP sufficient to ensure compliance with the PM emission limit.
- 6.) Condition 1 of general PM provisions, located on page 16 of the draft ROP, states in part that "[p]articulate emissions may not exceed 0.030 pounds of filterable PM emissions per million BTU, excluding back-half" The cited underlying requirements are paragraphs 89 and 93 of the Consent Decree (CD). However, paragraphs 89 and 93 of the CD do not include the term "back-half". Please define "back-half" as it is used in this condition, include its definition in the permit record, and confirm whether the requirements of the CD are still being met despite excluding back-half PM in this condition.
- 7.) The fugitive dust control program (FDCP) is included as appendix A of the malfunction abatement plan. Appendix A, section 2.6.2, provides a procedure to minimize fugitive dust from paved roads and concrete-covered areas by cleaning with either a street sweeper, vacuum truck, or washed with a water wagon as necessary. The FDCP does not define when these FDCP would be required. Please explain what conditions are required to be met in order to necessitate cleaning and update the FDCP as necessary.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name.

Genevieve Damico
Chief
Air Permits Section